

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MICHELE L. RAFFERTY, et al.,)	CASE NO.: 4:16cv00430
)	
Plaintiffs,)	JUDGE: BENITA PEARSON
)	
vs.)	<u>JOINT STIPULATION OF</u>
)	<u>UNCONTESTED FACTS</u>
TRUMBULL COUNTY, OHIO, et al.,)	
)	
Defendants.)	

Counsel for Plaintiffs Michelle Rafferty and Katie Sherman and Counsel for Defendants Trumbull County, Ohio, Thomas L. Altieri, Sheriff (in his official capacity), and Eric Shay, Lieutenant (in his official capacity) and counsel for Defendant Charles Drennen respectfully submit the following stipulations of facts for purposes of the parties' dispositive motions.

1. Plaintiff Michele Rafferty was incarcerated at the Trumbull County Jail from February 12, 2014 to August 16, 2014.
2. Plaintiff Katie Sherman was incarcerated at the Trumbull County Jail from November 18, 2013 to April 30, 2014.
3. Defendant Charles Drennen was employed as a corrections officer at the Trumbull County Jail by the Trumbull County Sheriff's Office from July 2010 to May 2014.
4. The Trumbull County Sheriff's Office has adopted a Code of Conduct and a Policy and Procedures Manual, both of which were in effect in 2014, governing the conduct of corrections officers at the Trumbull County Jail.
5. A copy of the Trumbull County Sheriff's Office Code of Conduct and the Trumbull County Jail's Policy and Procedures Manual was provided to Defendant Charles Drennen early in his tenure as a corrections officer at the Trumbull County Jail.
6. Defendant Charles Drennen received training regarding the Trumbull County Sheriff's Office Code of Conduct and the Trumbull County Jail's Policy and Procedures Manual.
7. Plaintiff Michele Rafferty has no personal knowledge of the training that Defendant Charles Drennen received before or during his tenure as a corrections officer at the Trumbull County Jail.



8. Plaintiff Katie Sherman has no personal knowledge of the training that Defendant Charles Drennen received before or during his tenure as a corrections officer at the Trumbull County Jail.
9. Defendant Charles Drennen was assigned to work in the female pod at the Trumbull County Jail, among various other job duties.
10. Defendant Charles Drennen never asked Plaintiff Michele Rafferty to engage in any lewd, sexual, or inappropriate conduct.
11. Defendant Charles Drennen is married with two children.

Respectfully Submitted,

s/Sarah Thomas Kovoov (6/26/17 email auth.)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 27th day of June, 2017 through the Court's electronic filing system:

s/Angelica M. Jarmusz
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Attorney for Defendant Charles Drennen

